Commonwealth of Kentucky Division for Air Quality

PERMIT STATEMENT OF BASIS

Title V *draft* No. V-98-027 QUIK-PIK INC. GEORGETOWN KY. June 2, 2000 APRIL J. WEBB REVIEWER

SOURCE DESCRIPTION:

This company paints metal frames which are alkaline cleaned, phosphatized, rinsed and dried prior to painting. The painted parts are dried in an oven. There are two automatic spray booths, two touch-up booths, a natural gas fired oven and wash tanks. The paints are thinned using xylene.

COMMENTS:

401 KAR 59:225 does not apply because the source choose to limit the emissions of VOCs to 90 tons per year.

Both spray booths have fabric filters with a designed control efficiency 99.0% for PM. Emission factors are from AP-42 and MSDS Sheets

The company is using a self-imposed limitation on paint use to limit the VOC emissions to less than 100 tons/yr. This will preclude the applicability of 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations.

Applicable regulations:

401 KAR 59:010, New process operations

401 KAR 63:060, List of hazardous air pollutants, petitions process, lesser quantity designations, and source category list.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.